

EXHIBIT 2

Sara Clark

From: Johnson, Crystal <cjohnson@paulweiss.com>
Sent: Tuesday, June 25, 2019 11:51 AM
To: Daniel Pulecio-Boek; Gabriel Soledad; Eric Winston; Scott Shelley; Samantha Gillespie; Sara Clark
Cc: GRP-OroNegro; Clareman, William; Synnott, Aidan; Rosenberg, Andrew N
Subject: Gil-White et al. v. Ercil et al., 19-AP-1294

[EXTERNAL EMAIL]

Counsel:

We understand that you have sent emails and texts to certain of the defendants in the adversary proceedings.

In addition to the defendants we previously told you we would represent, Paul, Weiss will represent CQS (UK) LLP, Asia Research and Capital Management Ltd., Alp Ercil, Ship Finance International Ltd., and GHIL Investments (Europe) Ltd. Any appearance we make on behalf of those entities will be a special appearance reserving all grounds to dismiss the complaints, including but not limited to personal jurisdiction.

At the appropriate time, we propose to negotiate a stipulation governing the action, which should address service for those defendants with a reservation of all other defenses including as to jurisdiction, and scheduling matters, including a briefing schedule for a motion to dismiss.

In order to respond to the complaint we will require an unredacted copy which we do not yet have. To facilitate that, we propose entering a protective order among the various counsel for the various defendants.

Thank you,

Crystal

Crystal Johnson | Associate - Admitted only in New York - *Not a member of the DC Bar. Supervised by a member of the DC Bar.
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW | Washington, DC 20006-1047
+1 202 223 7312 (Direct Phone) | +1 202 204 7369 (Direct Fax)
cjohnson@paulweiss.com | www.paulweiss.com

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